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Attorneys for Plaintiff and Counterdefendant
WEBCOR CONSTRUCTION, INC.
dba WEBCOR BUILDERS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA for the Use and
Benefit of WEBCOR CONSTRUCTION, INC.,
etc.,

Plaintiffs,

vs.

DICK/MORGANTI, a joint venture, et al.,

Defendants.

DICK/MORGANTI, a joint venture, et al.,

Counterclaimants,

v.

WEBCOR CONSTRUCTION, INC. and ST. PAUL
FIRE AND MARINE INSURANCE COMPANY,

Counterdefendants.

AND RELATED COUNTERCLAIMS AND
THIRD PARTY CLAIMS.

CASE NO.: 3:07-CV-02564-CRB

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO FILE
ANSWER TO COUNTERCLAIM**

Before: Hon. Charles R. Breyer

Pursuant to Local Civil Rule 6-2, Plaintiff and Counterdefendant WEBCOR CONSTRUCTION,
INC. dba WEBCOR BUILDERS ("Webcor") and Defendant, Counter-Claimant and Third Party

1 Complainant DICK/MORGANTI, a joint venture ("D/M") hereby stipulate and agree that the deadline
2 for Webcor and counter-defendant St. Paul Fire and Marine Insurance Company ("St. Paul") to file an
3 answer to D/M's counterclaim be further extended by one month from March 8, 2010, to April 7, 2010.
4 The parties and their representatives continue to meet and discuss various issues, including how
5 Webcor's claims will be addressed at the upcoming mediations with the Project owner. In the
6 meantime, the parties prefer to avoid spending time on litigation activities and filings in the case, and
7 therefore stipulate to this further extension of time.

8 The time for Webcor and St. Paul to file an answer to D/M's counterclaim has not been
9 previously extended. Additionally, there were thirteen extensions of time for D/M to file an answer and
10 counterclaim to Webcor's complaint, as well as other time extensions in connection with case
11 management conferences.

12 A declaration in support of this stipulated request is attached.

13
14 Dated: March 3, 2010

BOWLES & VERNA LLP

15
16 By: 

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KENNETH G. JONES
MICHAEL P. CONNOLLY
Attorneys for Plaintiff and Counterdefendant
WEBCOR CONSTRUCTION, INC. dba
WEBCOR BUILDERS

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21 Dated: March _____, 2010

HOWREY LLP

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23 By: _____

JOHN W. RALLS
JOHN FOUST
Attorneys for Defendants, Counter-Claimants,
and Third Party Complainants
DICK/MORGANTI, DICK
CORPORATION, and THE MORGANTI
GROUP

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25 and Third Party Complainants
26 DICK/MORGANTI, DICK
27 CORPORATION, and THE MORGANTI
28 GROUP

ORDER

The deadline for Plaintiff and Counter-Defendant WEBCOR CONSTRUCTION, INC. dba WEBCOR BUILDERS ("Webcor") and Counter-Defendant St. Paul Fire and Marine Insurance ("St. Paul") to file an answer to the counterclaim of Defendant, Counter-Claimant and Third Party Complainant DICK/MORGANTI, a joint venture ("D/M") is extended by one month from March 8, 2010, to April 7, 2010.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 05, 2010

By: _____

